

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

NETLIST, INC.,

Plaintiff,

vs.

SAMSUNG ELECTRONICS CO., LTD.
ET AL.

Defendants.

Case No. 2:22-cv-293-JRG (Lead Case)

JURY TRIAL DEMANDED

NETLIST, INC.,

Plaintiff,

vs.

MICRON TECHNOLOGY, INC.;
MICRON SEMICONDUCTOR
PRODUCTS, INC.; MICRON
TECHNOLOGY TEXAS LLC,

Defendants.

Case No. 2:22-cv-294-JRG

JURY TRIAL DEMANDED

**DECLARATION OF MICHAEL R. RUECKHEIM IN SUPPORT OF DEFENDANTS'
OPPOSITION TO NETLIST'S MOTION TO STRIKE CERTAIN OPINIONS OF
DEFENDANTS' EXPERT MR. JOHN HALBERT (DKT. 358)**



I, Michael R. Rueckheim, declare as follows:

1. I am an attorney at the law firm of Winston & Strawn LLP, counsel of record for Defendants Micron Technology, Inc., Micron Semiconductor Products, Inc., and Micron Technology Texas LLC (collectively, “Micron”) in the above captioned matter. I am a member in good standing of the State Bar of Texas. I provide this declaration in support of Defendants’ Opposition to Netlist’s Motion to Strike Certain Opinions of Defendants’ Expert Mr. John Halbert.

2. Attached as Exhibit 21 is a true and correct copy of excerpts of Micron’s Objections and Responses to Notices of Deposition Pursuant to Rule 30(b)(6) served on opposing counsel on November 9, 2023.

3. Attached as Exhibit 25 is a true and correct copy of excerpts of Micron’s Corrected Sixth Supplemental Responses and Objections to Plaintiff Netlist, Inc.’s First Set of Amended Interrogatories (Nos. 1-20) served on opposing counsel on January 22, 2024.

4. Attached as Exhibit 26 is a true and correct copy of excerpts of Micron’s Corrected Second Supplemental Responses and Objections to Plaintiff Netlist, Inc.’s Second Set of Amended Interrogatories (Nos. 21-31) served on opposing counsel on January 22, 2024.

I declare under penalty of perjury under laws of the United States of America that the foregoing is true and correct.

Executed on January 30, 2024.

/Michael R. Rueckheim /

Michael R. Rueckheim

CERTIFICATE OF SERVICE

I hereby certify that on January 30, 2024, the foregoing document was electronically filed with the Clerk of Court using the Court's CM/ECF system, which will send notification of such filing to all counsel of record, including counsel of record for Plaintiff Netlist Inc.

/s/ Michael R. Rueckheim

Michael R. Rueckheim

CERTIFICATE OF AUTHORIZATION TO FILE UNDER SEAL

I hereby certify that the foregoing document and exhibits attached hereto are authorized to be filed under seal pursuant to the Protective Order entered in this case.

/s/ Michael R. Rueckheim

Michael R. Rueckheim